

Hon. Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ESTHER HOFFMAN; *et al.*,

Plaintiffs,

vs.

TRANSWORLD SYSTEMS
INCORPORATED; *et al.*,

Defendants.

No. 2:18 cv 1132-TSZ

DEFENDANTS PATENAUDE & FELIX,
A.P.C. AND MATTHEW CHEUNG'S
JOINDER IN TSI'S MOTION FOR
SUMMARY JUDGMENT

NOTED FOR HEARING:
JULY 23, 2021

Patenaude & Felix, APC and Matthew Cheung (collectively "Patenaude") join TSI's motion for summary judgment, without waiving their right to file their own dispositive motion at some point in the future, if necessary.

Essentially all Plaintiffs' claims against Patenaude in their Second Amended Complaint, (Dkt 61), arise from Patenaude filing the affidavits of TSI employees in support of motions in underlying state litigation. Plaintiffs' describe these affidavits as "false" and "deceptive." *See* (Dkt 61 at the Introduction, and ¶¶ 48-57, 73-81, 167, 169, 184(a), (c)).

In its motion, TSI dispels the idea that the declarations are false or deceptive. Patenaude did not violate the CPA by filing true and correct affidavits. Therefore, claims against Patenaude should be dismissed with prejudice.

1 DATED this 11th day of June, 2021.

2 LEE SMART, P.S., INC.

3 By: /s Marc Rosenberg

4 Marc Rosenberg, WSBA No. 31034
5 Of Attorneys for Defendants
6 Patenaude & Felix, APC, and
7 Matthew Cheung

8 1800 One Convention Place
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CERTIFICATE OF SERVICE

I hereby certify that on the date provided at the signature below, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following individuals:

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I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, to the best of my knowledge.

Dated this 11th day of June, 2021 at Seattle, Washington.

LEE SMART, P.S., INC.

By: /s/ Marc Rosenberg

Marc Rosenberg, WSBA No. 31034
Of Attorneys for Defendants
Patenaude & Felix, APC, and
Matthew Cheung

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